



A champion for change towards
cancer awareness and prevention

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May 12, 1999

Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Ln., Room 1061
Rockville, MD 20852

1815 East 41st Street - Suite C
Minneapolis, MN 55407
612-729-0591 FAX

612-729-0491 TWIN CITIES METRO
1-800-908-8544 GREATER MINNESOTA

Re: Docket #98N-1038, "Irradiation in the Production, Processing and Handling of Food"

To Whom It May Concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food. As of the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package.

The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

Yours truly,

Barbra Wiener
Executive Director

Carol K. Johnson
Co-Chair, Environmental Action Group
Louise Haldridge
Co-Chair, Environmental Action Group

cc: Sen. Paul Wellstone

Sen. Rod Grams

Reps: Jim Ramstad, Martin Sabo, Bruce Vento
and entire Minnesota Delegation.



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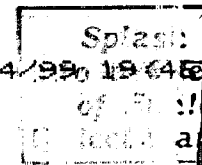
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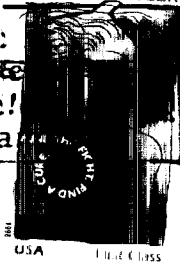
1815 East 41st Street - Suite C
Minneapolis, MN 55407



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BREAST CANCER



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5630 Fishers Ln., Room 1061
Rockville, MD 20852

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